

MEMBERS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES BONOMO,

Plaintiff,

-against-

MITSUBISHI INTERNATIONAL CORPORATION.

Defendant.

Index No. 07 Civ. 5967 (CM)

STIPULATION REGARDING
EXTENSION OF DISCOVERY
CUT-OFF AS TO WILLIAM
STRUYK'S DEPOSITION
FOLLOWING MAGISTRATE
JUDGE'S ORDER RE
DEPOSITION

WHEREAS, the parties promptly began discovery in this case by: (i) serving document requests and interrogatories; (ii) completing Plaintiff's depositions; and (iii) serving additional interrogatories, document requests, requests for admissions, and subpoenas in accordance with the Civil Case Management Plan ordered in this case on September 7, 2007;

WHEREAS, Defendant deposed Mr. William Struyk on May 1, 2008;

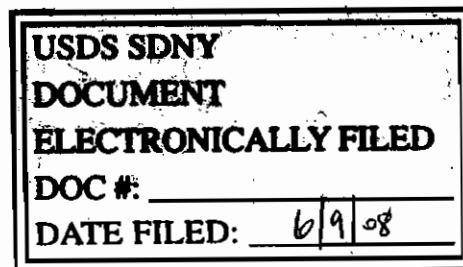
WHEREAS, Mr. Struyk's attorney directed Mr. Struyk not to answer several questions on the grounds of spousal and attorney-client privileges;

WHEREAS, on May 27, 2008 after a conference with the parties, Magistrate Judge Fox ordered that Mr. Struyk must answer questions he was directed not to answer during his deposition based upon his assertion of the spousal privilege and the attorney-client privilege;

WHEREAS, May 28, 2008 was the discovery cut-off date ordered by the Court;

WHEREAS, the parties and Mr. Struyk have agreed to continue Mr. Struyk's deposition on June 17, 2008, pursuant to Magistrate Judge Fox's Order;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned



parties that good cause exists for the parties to request that the continued deposition Mr. Struyk be permitted to go forward on June 17, 2008. No other deadlines are being changed, including the July 30, 2008 submission date for the joint pre-trial order.

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*Attorneys for Defendant
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SO ORDERED:

Colleen McMahon

Colleen McMahon, U.S.D.J.

Date:

6/4/08